



Littler Mendelson, P.C.
900 Third Avenue
New York, NY 10022.3298

Miguel A. Lopez
212.471.4482 direct
212.583.9600 main
malopez@littler.com

May 31, 2023

Application GRANTED in part. The final conference and pre-motion letter typically follow the close of all discovery. Accordingly, any pre-motion letters shall be filed by **September 6, 2023**, and the pre-motion conference currently scheduled for June 14, 2023, is adjourned to **September 20, 2023**, at 4:20 P.M.

VIA ECF

Dated: June 1, 2023
New York, New York

Hon. Lorna G. Schofield
U.S. District Court, Southern District of N.Y.
40 Foley Square, Courtroom 1106
New York, New York 10007

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *loanDepot.com, LLC v. CrossCountry Mortgage, LLC, et al.*, No. 1:22-cv-05971-LGS
Request for adjournment of pre-motion conference

Dear Judge Schofield:

Pursuant to the Court's Rule I(B)(2), counsel for Plaintiff loanDepot.com, LLC ("Plaintiff" or "loanDepot") writes on behalf of all parties to request a brief adjournment of the pre-motion conference currently scheduled for June 14, 2023, and the pre-motion letter submission deadline currently set for today, May 31, 2023. The parties request that the pre-motion conference be adjourned to July 19, 2023, and the pre-motion letter submission deadline be adjourned to July 5, 2023. This is the parties' first request for an adjournment of this conference.

The parties request this additional time to complete their fact depositions prior to the submission of any pre-motion letters. The parties also note that the pre-motion conference at issue was originally scheduled to occur approximately one month after the close of all discovery (*see* ECF No. 178), and Magistrate Cave has since extended the fact deposition deadline to June 16, 2023 and the expert discovery deadline to August 18, 2023 (ECF No. 348). The parties have taken 14 depositions to date, and have eight noticed depositions remaining. The parties may move Magistrate Cave for a brief extension of the fact deposition deadline until June 30, 2023, but that will not affect the present request.

Hon. Lorna G. Schofield
May 31, 2023
Page 2

Respectfully submitted,

/s/ Miguel A. Lopez

cc: All Counsel of Record